

Pursuant to the Federal Rules of Civil Procedure 30, 33, 34, and 36, John Doe respectfully renews his request for an Order expediting discovery. Specifically, John Doe requests Defendant University of Chicago (“UC”) answer interrogatories, requests for admissions, and document production requests contained in Exhibit 1 to this Motion.

<sup>1</sup> See, Civ. R. 33(b)(2), Civ. R. 34(b)(2)(A) and Civ. R. 36(a)(3)(requiring parties to respond to document requests, interrogatories, and requests for admissions, “within 30 days . . . [but] shorter . . . time for responding may be stipulated to under Rule 29 or by the Court.”

<sup>2</sup> *Id.*

Expedited discovery is appropriate in this case because the facts suggest UC will not be subject to undue burden or unnecessary inconvenience. The information John Doe seeks involves matters of personal knowledge and documents likely to be in UC's immediate possession. As each day passes, the irreparable harm detailed in John Doe's Complaint becomes worse. Moreover, a denial of John Doe's request for expedited discovery will significantly prejudice his ability to produce evidence at the injunction hearing. As a result, John Doe respectfully requests this Court find good cause exists for granting the proposed attached Order granting the aforementioned expedited discovery.

Respectfully submitted,  
Attorney for John Doe

By: /s/ Eric J. Rosenberg

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**CERTIFICATE OF SERVICE**

I certify that on September 7, 2016, I filed this court filing with the Clerk of Court using the CM/ECF system which will send notification of the filing to all registered parties and that a copy of this court filing was mailed via regular U.S. Mail to Jane Doe's home address.

/s/Eric Rosenberg